

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSE GUZMAN

Case No.: Case No. 1:16-cv-03499-GBD

Plaintiff,

-against-

MEL S. HARRIS AND ASSOCIATES, LLC  
LR CREDIT 13, LLC  
MEL S. HARRIS  
DAVID WALDMAN  
KERRY H. LUTZ  
TODD FABACHER  
MICHAEL YOUNG  
SAMSERV, INC  
JOHN ANDINO  
WILLIAM MLOTOK

Defendants.

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**PLAINTIFF'S NOTICE OF MOTION OBJECTING IN PART TO MAGISTRATE  
ORAL ORDER DENYING PLAINTIFF'S MOTION TO COMPEL [DE 76]**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law in Support of Plaintiff's Partial Objection to Magistrate Oral Ruling Denying Plaintiff's Motion To Compel [DE 76] pursuant to Fed. R. Civ. P. 72(a), the Keshavarz Declaration in Support dated November 23, 2016 and all Exhibits attached thereto, Plaintiff will move this Honorable Court before United States District Judge George B. Daniels, located at United States District Court, Southern District of New York, 500 Pearl St., New York, NY 10007, Courtroom 11A, at a time to be determined by the Court for an Order granting Plaintiff's aforesaid motion.

Respectfully submitted,

/s/

Ahmad Keshavarz  
Attorney for Plaintiff

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### CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Defendant LR Credit 13, LLC  
By and through its attorneys of record  
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Defendants Samserv, Inc. and William Mlotok  
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Date: November 23, 2016

Brooklyn, NY  
/s/  
Ahmad Keshavarz  
Attorney for Plaintiff